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November 7, 2002

Ms Marlene H. Dortch
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

Re: WC Docket No. 02-307 – Ex Parte # **/**
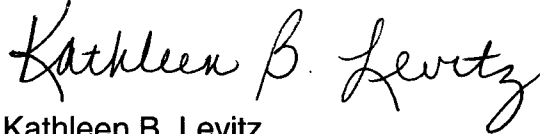
Dear Ms Dortch:

This is to inform you that on November 6, 2002, I met with Christine Newcomb of the Commission's Wireline Competition Bureau and Laurel Bergold of the Commission's Office of General Counsel at their request to discuss and clarify Exhibit PM-27 attached to the Reply Affidavit of Alphonso Varner filed in support of BellSouth's Reply in this proceeding. Al Varner, Gay Dilz and Ken Culpepper of BellSouth also participated in the meeting by telephone. I am attaching a document that summarizes the points made by BellSouth during the meeting.

During this meeting I also responded to questions Ms. Newcomb posed relating to BellSouth's requiring that when a CLEC requests the porting of all the numbers used by a BellSouth customer taking certain complex services involving direct inward dialing, the CLEC specify whether its new customer intends to continue to use the relevant BellSouth facility. In response to her questions, I explained that this requirement had been in place since June 2001 and that BellSouth has no record of any CLEC other than AT&T expressing a problem with the requirement. Ms. Newcomb also inquired about the outcome of the Change Control Process meeting that had occurred on November 4, 2002, at which BellSouth had discussed with participating CLECs the need to delay software Release 11.0 and the decisions reached during that meeting. At Ms. Newcomb's request, I am attaching the following document summarizing the decisions the CLECs reached at that meeting and BellSouth's response, which

the BellSouth Change Management Team shared with the CLEC participants on November 5, 2002.

In accordance with Section 1.1206, I am filing this notice and the accompanying attachment electronically and request that you please place them in the record of the proceeding identified above. Thank you.

Sincerely,

Kathleen B. Levitz

Attachment

cc: Christine Newcomb
Laurel Belgold
Janice Myles
James Davis-Smith
Luin Fitch
Sara Kyle
Beth Keating

BellSouth Response to CLEC Request Submitted on November 4, 2002

CLEC Request

CLECs agree to BellSouth's option 1 with the following additional points. BellSouth will provide the following information on a twice a week basis:

1. Status on Mondays and Thursdays
2. Complete listing of the number of severity 1 and severity 2 defects and the process being used to close them
3. Plan to meet the due date
4. Final go/no go on 11/18

In addition, we want a complete escalation of what BellSouth is doing to ensure that these problems do not continue on an on-going basis, a firm commitment to fix defects found in this release, and an explanation of what actually caused these problems (resources, programmer problems, poor specifications, etc.)

BellSouth Response

1. BellSouth will provide updated statuses via email to the CCP distribution list on the progress of Release 11.0 by close of business on Tuesdays and Fridays, beginning on Friday, November 8, 2002. These statuses will be provided until BellSouth's internal Systems Test Phase is complete. During its Systems Test Phase, BellSouth will provide the percent of testing completed in the status report.

   The statuses will also include the following information by feature:

   - Number of Severity 1 and 2 defects open
   - Date on which the code shipped to fix the defects will be received
   - Number of closed Severity 1 and 2 defects since the last report

   In addition, BellSouth will hold the CAVE go/no go call on November 18, 2002 to review all open CLEC affecting defects. Once the CAVE pre-release testing begins, BellSouth will provide the CLEC/Vendor community with a daily testing environment status report, which will be posted on the BellSouth Interface Implementation and Testing Home Page. This report will be used to track any CLEC/Vendor affecting defects that exist in the environment once it is opened for pre-release testing. The report will be updated to include any known workarounds, severity level, estimated correction dates (when known), and will also notify CLECs of when defects have been corrected and are ready for re-test.

   In addition, BellSouth will host a weekly conference call with the CLEC community during the CAVE pre-release testing phase. During this conference call, BellSouth will respond to questions and concerns regarding the daily testing environment status reports, as well as the on-going CLEC/Vendor testing efforts.

2. BellSouth will provide the CLEC Community with a preliminary assessment of the issues that led to the delay of Release 11.0 by November 13, 2002. A root-cause analysis will be provided after Release 11.0 is in production and the software development teams have had a chance to perform their comprehensive assessment.

July 2002 O-8 Reject Interval (97% in 1 Hour)	Description Cross Reference (Tab 3)	Percent of Total Misses	TN Volume	Swing	Measure if Fixed	Pass/Fail
Residence						
Miscellaneous error codes after a FOC (Manually processed LSR)	6	68.75%	22	2.50%	98.87%	Pass
Miscellaneous error codes (Manually processed LSR)	7	12.50%	4	0.46%	96.83%	Fail
Already Working Error	2	9.38%	3	0.34%	96.71%	Fail
Lag in processing - following "AUTO CLARIFICATION" PLACED BY LESOG and before Clarify Requested for VER-9 (Defect 22374)	9	6.25%	2	0.23%	96.60%	Fail
Multiple Resends to front-end	10	3.13%	1	0.12%	96.49%	Fail
Total Misses			32		100.00%	Pass
Total Volume			882	3.63%	100.00%	
Measure			96.37%		Pass	

Note: Above analysis is based on a 100% sample of misses (32 PONs)

July 2002 O-8 Reject Interval (97% in 1 Hour)	Description Cross Reference (Tab 3)	Percent of Total Misses	TN Volume	Swing	Measure if Fixed	Pass/Fail
PBX1 (A.1.4.4)						
MANUALP	5	100.00%	1	100.00%	100.00%	Pass
Total Misses			1			
Total Volume			1	100.00%	100.00%	
Measure			0.00%		Pass	

Note: Above analysis is based on a 100% sample of misses (1 PON)

July 2002 O-8 Reject Interval (97% in 1 Hour)	Description Cross Reference (Tab 3)	Percent of Total Misses	TN Volume	Swing	Measure if Fixed	Pass/Fail
Loop + Port Combinations						
EDI Front-end Timestamp	1	35.54%	43	2.30%	95.84%	Fail
Time Lags in Processing	8	25.62%	31	1.65%	95.19%	Fail
Multiple Resends to front-end	10	13.22%	16	0.85%	94.39%	Fail
Miscellaneous error codes after a FOC (Manually processed LSR)	6	13.22%	16	0.85%	94.39%	Fail
Lag in processing - following "AUTO CLARIFICATION" PLACED BY LESOG and before Clarify Requested for VER-9 (Defect 22374)	9	9.92%	12	0.64%	94.18%	Fail
Miscellaneous error codes (Manually processed LSR)	7	3.31%	4	0.21%	93.75%	Fail
Total Misses			121			
Total Volume			1,873	6.46%	100.00%	
Measure			93.54%		Pass	

Note: Above analysis is based on a 26% sample of misses (31 PONs)

July 2002 O-8 Reject Interval (97% in 1 Hour)	Description Cross Reference (Tab 3)	Percent of Total Misses	TN Volume	Swing	Measure if Fixed	Pass/Fail
Line Sharing						
Miscellaneous error codes after a FOC (Manually processed LSR)	6	50.00%	2	7.69%	92.31%	Fail
MANUALP	5	25.00%	1	3.84%	88.46%	Fail
Time Lags in Processing	8	25.00%	1	3.84%	88.46%	Fail
Total Misses			4			
Total Volume			26	15.38%	100.00%	
Measure			84.62%		Pass	

Note: Above analysis is based on a 100% sample of misses (4 PONs)

July 2002 O-8 Reject Interval (97% in 1 Hour)	Description Cross Reference (Tab 3)	Percent of Total Misses	TN Volume	Swing	Measure if Fixed	Pass/Fail
2W Analog Loop Design						
Miscellaneous error codes after a FOC (Manually processed LSR)	6	100.00%	13	25.00%	100.00%	Pass
Total Misses			13			
Total Volume			52	25.00%	100.00%	
Measure			75.00%		Pass	

Note: Above analysis is based on a 100% sample of misses (13 PONs)

July 2002 O-8 Reject Interval (97% in 1 Hour)	Description Cross Reference (Tab 3)	Percent of Total Misses	TN Volume	Swing	Measure if Fixed	Pass/Fail
2W Analog Loop Non-Design						
Miscellaneous error codes after a FOC (Manually processed LSR)	6	100.00%	1	25.00%	100.00%	Pass
Total Misses			1			
Total Volume			4	25.00%	100.00%	
Measure			75.00%		Pass	

Note: Above analysis is based on a 100% sample of misses (1 PON)

July 2002 O-8 Reject Interval (97% in 1 Hour)	Description Cross Reference (Tab 3)	Percent of Total Misses	TN Volume	Swing	Measure if Fixed	Pass/Fail
Other Design						
MANUALP	5	66.67%	4	22.22%	88.89%	Fail
Miscellaneous error codes after a FOC (Manually processed LSR)		33.33%	2	11.11%	77.78%	Fail
Total Misses			6			
Total Volume			18	33.33%	100.00%	
Measure			66.67%		Pass	

Note: Above analysis is based on a 100% sample of misses (6 PONs)

July 2002 O-8 Reject Interval (97% in 1 Hour)	Description Cross Reference (Tab 3)	Percent of Total Misses	TN Volume	Swing	Measure if Fixed	Pass/Fail
Other Non-Design						
MANUALP	5	54.55%	6	8.00%	93.33%	Fail
Miscellaneous error codes (Manually processed LSR)	7	18.18%	2	2.67%	88.00%	Fail
Listing Already Exists Error	4	18.18%	2	2.67%	88.00%	Fail
EDI Front-end Timestamp	1	9.09%	1	1.34%	86.67%	Fail
Total Misses		100.00%	11			
Total Volume			75	14.67%	100.00%	
Measure			85.33%		Pass	

Note: Above analysis is based on a 100% sample of misses (11 PONs)

July 2002 O-8 Reject Interval (97% in 1 Hour)	Description Cross Reference (Tab 3)	Percent of Total Misses	FL Volume	Swing	Measure if Fixed	Pass/Fail
Residence						
USOC Incompatibility	3	41.52%	137	1.42%	98.00%	Pass
Miscellaneous error codes (Manually processed LSR)	7	22.12%	73	0.76%	97.34%	Pass
Miscellaneous error codes after a FOC	6	16.97%	56	0.58%	97.16%	Pass
Already Working Error	2	5.45%	18	0.19%	96.77%	Fail
MANUALP	5	2.73%	9	0.09%	96.67%	Fail
Total Misses			330			
Total Volume			9,649	3.04%	99.62%	
Measure			96.58%		Pass	

Note: Above analysis is based on a 11% sample of misses (36 PONs)

July 2002 O-8 Reject Interval (97% in 1 Hour)	Description Cross Reference (Tab 3)	Percent of Total Misses	FL Volume	Swing	Measure if Fixed	Pass/Fail
Business						
USOC Incompatibility	3	50.00%	10	1.63%	98.37%	Pass
Miscellaneous error codes after a FOC	6	25.00%	5	0.82%	97.56%	Pass
Miscellaneous error codes (Manually processed LSR)	7	20.00%	4	0.65%	97.39%	Pass
EDI Front-end Timestamp	1	5.00%	1	0.17%	96.91%	Fail
Total Misses			20			
Total Volume			614	3.26%	100.00%	
Measure			96.74%		Pass	

Note: Above analysis is based on a 100% sample of misses (20 PONs)

July 2002 O-8 Reject Interval (97% in 1 Hour)	Description Cross Reference (Tab 3)	Percent of Total Misses	FL Volume	Swing	Measure if Fixed	Pass/Fail
Loop + Port Combinations						
EDI Front-end Timestamp	1	30.02%	190	2.05%	95.18%	Fail
USOC Incompatibility	3	27.49%	174	1.88%	95.01%	Fail
Miscellaneous error codes (Manually processed LSR)	7	9.95%	63	0.67%	93.80%	Fail
Lag in processing - following "AUTO CLARIFICATION" PLACED BY LESOG and before Clarify Requested for VER-9 (Defect 22374)	9	7.42%	47	0.50%	93.63%	Fail
Miscellaneous error codes after a FOC	6	7.42%	47	0.50%	93.63%	Fail
Time Lags in Processing	8	5.06%	32	0.34%	93.47%	Fail
MANUALP	5	5.06%	32	0.34%	93.47%	Fail
COG/DDC down for maintenance period	11	5.06%	32	0.34%	93.47%	Fail
Multiple Resends to front-end	10	2.53%	16	0.16%	93.29%	Fail
Total Misses			633			
Total Volume			9,200	6.87%	100.00%	
Measure			93.13%		Pass	

Note: Above analysis is based on a 6% sample of misses (40 PONs)

July 2002 O-8 Reject Interval (97% in 1 Hour)	Description Cross Reference (Tab 3)	Percent of Total Misses	FL Volume	Swing	Measure if Fixed	Pass/Fail
ISDN Loop						
Miscellaneous error codes (Manually processed LSR)	7	60.00%	3	12.50%	91.67%	Fail
Miscellaneous error codes after a FOC	6	40.00%	2	8.33%	87.50%	Fail
Total Misses			5			
Total Volume			24	20.83%	100.00%	
Measure			79.17%		Pass	

Note: Above analysis is based on a 100% sample of misses (5 PONs)

July 2002 O-8 Reject Interval (97% in 1 Hour)	Description Cross Reference (Tab 3)	Percent of Total Misses	FL Volume	Swing	Measure if Fixed	Pass/Fail
Line Sharing						
Miscellaneous error codes after a FOC	6	63.64%	7	13.20%	92.45%	Fail
MANUALP	5	18.18%	2	3.77%	83.02%	Fail
Miscellaneous error codes (Manually processed LSR)	7	18.18%	2	3.77%	83.02%	Fail
Total Misses			11			
Total Volume			53	20.75%	100.00%	

| Measure | | | | 79.25% | | Pass | |

Note: Above analysis is based on a 100% sample of misses (11 PONs)

July 2002 O-8 Reject Interval (97% in 1 Hour)	Description Cross Reference (Tab 3)	Percent of Total Misses	FL Volume	Swing	Measure if Fixed	Pass/Fail
2W Analog Loop Design						
Miscellaneous error codes (Manually processed LSR)	7	64.29%	27	17.65%	90.20%	Fail
Miscellaneous error codes after a FOC	6	23.81%	10	6.53%	79.08%	Fail
MANUALP	5	4.76%	2	1.31%	73.86%	Fail
Time Lags in Processing	8	2.38%	1	0.65%	73.20%	Fail
Multiple Resends to front-end	10	2.38%	1	0.65%	73.20%	Fail
Multiple "System Requeued" Messages	12	2.38%	1	0.65%	73.20%	Fail
Total Misses			42			
Total Volume			153	27.45%	100.00%	
Measure			72.55%		Pass	

Note: Above analysis is based on a 100% sample of misses (42 PONs)

July 2002 O-8 Reject Interval (97% in 1 Hour)	Description Cross Reference (Tab 3)	Percent of Total Misses	FL Volume	Swing	Measure if Fixed	Pass/Fail
2W Analog Loop Non-Design						
MANUALP	5	57.75%	41	27.70%	79.73%	Fail
Miscellaneous error codes after a FOC	6	25.35%	18	12.16%	64.19%	Fail
Miscellaneous error codes (Manually processed LSR)	7	14.08%	10	6.75%	58.78%	Fail
Time Lags in Processing	8	2.82%	2	1.35%	53.38%	Fail
Total Misses			71			
Total Volume			148	47.97%	100.00%	
Measure			52.03%		Pass	

Note: Above analysis is based on a 51% sample of misses (36 PONs)

July 2002 O-8 Reject Interval (97% in 1 Hour)	Description Cross Reference (Tab 3)	Percent of Total Misses	FL Volume	Swing	Measure if Fixed	Pass/Fail
Other Design						
MANUALP	5	37.50%	12	16.66%	72.22%	Fail
Miscellaneous error codes (Manually processed LSR)	7	31.25%	10	13.88%	69.44%	Fail
Miscellaneous error codes after a FOC	6	25.00%	8	11.11%	66.67%	Fail
EDI Front-end Timestamp	1	9.38%	3	4.16%	59.72%	Fail
Multiple Resends to front-end	10	3.13%	1	1.38%	56.94%	Fail
Total Misses			32			
Total Volume			72	44.44%	100.00%	
Measure			55.56%		Pass	

Note: Above analysis is based on a 100% sample of misses (32 PONs)

July 2002 O-8 Reject Interval (97% in 1 Hour)	Description Cross Reference (Tab 3)	Percent of Total Misses	FL Volume	Swing	Measure if Fixed	Pass/Fail
Other Non-Design						
Listing Already Exists Error	4	52.09%	1,247	17.39%	84.00%	Fail
Miscellaneous error codes (Manually processed LSR)	7	22.93%	549	7.66%	74.27%	Fail
EDI Front-end Timestamp	1	8.31%	199	2.78%	69.39%	Fail
Lag in processing - following "AUTO CLARIFICATION" PLACED BY LESOG and before Clarify Requested for VER-9 (Defect 22374)	9	8.31%	199	2.78%	69.39%	Fail
Multiple "System Requeued" Messages	12	6.27%	150	2.09%	68.70%	Fail
COG/DDC Down for Maintenance Period	11	2.09%	50	0.70%	67.31%	Fail
Total Misses			2394			
Total Volume			7,170	33.39%	100.00%	
Measure			66.61%		Pass	

Note: Above analysis is based on a 2% sample of misses (48 PONs)

ISSUE	STATUS
1. The interface to the EDI system is a file created by the CLECs with the LSR ordering information. If a large file is received, excessive delays are encountered. When such files are received in EDI, the data must be mapped before any error checking can begin. Consequently, this mapping process for large files may delay the start of error checking by 30 minutes or more. This was not an issue until a large file had to be processed. BellSouth has restructured the ENCORE mapping that enabled more efficient processing of the data.	1. Fixed in ENCORE Release 10.6 on August 25, 2002. Corresponding Test Director will be implemented with October data.
2. Errors are being detected after an FOC is returned to the CLEC associated with working Telephone Numbers. When a CLEC sends in an LSR for a new telephone number and completes the LSR properly, an FOC will be returned. However, if that telephone number is found to be working after the FOC was issued, the order cannot be provisioned. Such LSRs are sent to a service representative for manual review and are manually rejected and returned to the CLEC. BellSouth will begin checking the status of the telephone number in additional databases before the FOC is returned to the CLEC.	2. Implemented in ENCORE Release 10.7.1 on October 11, 2002. Will be included with November data release.
3. Errors are being detected after the LSR has already received an FOC for incompatible USOCs. When a CLEC sends in an LSR for a service and completes the LSR properly, an FOC will be returned. However, if any of the USOCs are incompatible, then the order cannot be provisioned. As in item 2 above, the LSR is manually rejected and returned to the CLEC. BellSouth will begin checking for incompatibility of requested USOCs before the FOC is returned to the CLEC.	3. Currently being scheduled for release date.
4. Errors are being detected after the LSR has already received an FOC for working accounts. When a CLEC sends in an LSR for a new account and completes the LSR properly, an FOC will be returned. However, if that account is found to be working, then the order cannot be provisioned. As in item 2 above, the LSR is manually rejected and returned to the CLEC. If the LSR was submitted as a record only change to the directory listing, this would not be an issue. BellSouth is investigating whether further source system changes can be implemented to address this issue.	4. Currently being evaluated for implementation.
5. Errors are being detected for LSRs that are Planned for Manual Fallout, but are being counted as Fully Mechanized. Such LSRs are designed to be worked by a service representative. If a CLEC calls regarding an LSR and the service representative retrieves the record outside of their normal process for retrieving orders, the LSR is not properly counted as Partially Mechanized because the proper service representative information is not populated and PMAP counts the LSR as Fully Mechanized.	5. Training issue.
6. Errors are being detected after the LSR has already received a FOC for various error messages. Examples of error messages after the FOC are "TN Reserved", "Pending Order for this TN", and "Working Service on Premises". The error messages are not currently happening with significant volume for each unique message or in a repetitive nature each month. Such LSRs are sent to a service representative for manual review and are manually rejected and returned to the CLEC.	6. Currently under analysis for resolution.
7. Errors are being detected for LSRs with various error messages. The error messages are not currently happening with significant volume for each unique message or in a repetitive nature each month. Examples of error messages are "Jeopardy Notification Sent" and "Maximum number of unanswered PONS are out to LESOG". Such LSRs are sent to a service representative for manual review and are manually rejected and returned to the CLEC.	7. Currently under analysis for resolution.

8. Errors are being detected for LSRs that are experiencing time delays in processing. The LSRs are flowing through the mechanized systems, but are experiencing system delays causing the LSRs to be delayed in sending Rejects. Systems delays could be some type of delay with the systems communicating with each other or a delay within a particular system. When the issue causing the delay clears, the LSR continues to flow through the system.	8. Currently under analysis for resolution.
9. Errors are being detected for LSRs that are experiencing a delay in processing following the "Auto Clarification Placed by LESOG" error message. These LSRs are a subset of Issue 8. The application teams were able to pinpoint the root cause of this issue. Within LEO, certain Auto Clarifications were inserted into a queue to be delivered to the front end system, but were being bypassed with other data thus delaying the delivery of the response.	9. Implemented with ENCORE Release 10.6 on August 25, 2002.
10. Errors are being detected for LSRs where responses must be sent multiple times to the front end system. This error message happens under two conditions: 1.) The CLEC TAG Listener is down and although TAG is sending the Reject, the CLEC Listener cannot accept the Reject because it is not running properly on the CLEC side. 2.) There is a data issue between LEO and TAG causing the Reject to not be delivered to the CLEC and requiring a resend from LEO.	10. 1.)CLEC Listener: Test Director will be implemented with November data and will take the timestamp from the attempt to send the response. 2.) Resend from LEO: Currently under analysis for resolution.
11. Errors are being detected for LSRs with the error message "COG/DDC down for maintenance period". When this error occurs, the systems cannot communicate with the COG/DDC, thus delaying processing of the LSR. When COG/DDC becomes available, processing of the order continues.	11. Currently under analysis for resolution.
12. Errors are being detected for LSRs where system data must be requeued and resent to various downstream applications. If a system is down or there is a data transport issue, the system will queue the data to be sent after a certain period of time. The LSRs will process when the issue is resolved, but the delays are causing Reject Interval failures.	12. Currently under analysis for resolution.